REVISION C



OSMA Management of NASA Safety Reporting System (NSRS)

Bryan O'Connbr

Associate Administrator for Safety and Mission Assurance

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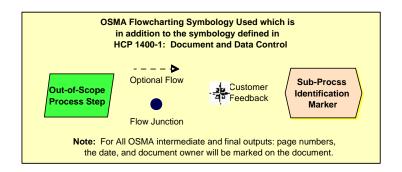
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Baseline		February 17, 2000	
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	В	February 1, 2002	Changed HOWI Author. Added customer list. Editorial correction to definition in section 3.2, references 4.6 and 4.7, and step 6.07. Process explanation added to section 6 introduction and step 6.15. Changed steps 6.16 and 6.17 and Appendix A form.
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HOWI Authors: QS/Eric Raynor & Q/Paul Boellner

OSMA Staff Member Responsible for this HOWI: QS/Michael Stamatelatos, Ph.D.

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1. Purpose

The purpose of the Office of Safety and Mission Assurance (OSMA) Headquarters Office Work Instruction (HOWI) is to document the administration process for the NASA Safety Reporting System (NSRS). The NSRS is an anonymous, responsive, and voluntary safety reporting system that complements NASA's established safety reporting channels. NASA employees and contractors are encouraged to mail in an NSRS reporting form whenever they perceive an urgent hazard or lack of action on a previously reported hazard. The NSRS is a means for raising safety concerns to the highest levels of NASA management. NSRS operations are characterized as ANONYMOUS and RESPONSIVE (see Section 3 for definitions). This OSMA HOWI also specifies the Quality Records associated with the process.

2. Scope and Applicability

This HOWI applies to the OSMA staff member and the Contracting Officer Technical Representative (COTR) who manage the NSRS (and its support contractor) and the OSMA management in their review of these efforts.

The NSRS applies to any NASA or contractor employee and any activity in which hazards may be present. The NSRS accepts reports on hazards affecting any NASA-related activity, with a focus on the NASA programs where hazards may create the greatest potential for harm (i.e., Space Shuttle, Space Station, Expendable Launch Vehicles, Aeronautics, Payloads and Research and Development Facilities). The NSRS comprises a support contractor-operated NSRS Administration office who administers the anonymous reporting system, potential NSRS reporters, the NASA Safety and Assurance Requirements Division (Code QS), the NSRS Technical Advisory Group (TAG) Chair (a.k.a.: NSRS Chair), and Center Technical Advisory Group representatives. Reported hazards are expected to be real safety concerns about NASA programs involving personnel, flight hardware, facilities, or property and equipment. Non-safety related concerns are outside the scope of the NSRS and are provided to the proper authority for action.

3. Definitions

- 3.1. AA/SMA: Associate Administrator for Safety and Mission Assurance
- 3.2. <u>Anonymous (with respect to the NSRS Process)</u>: Reporters' identities will not be disclosed and no submitted information shall be used directly or indirectly to identify any reporter
- 3.3. Center Technical Advisory Groups: NSRS TAG working groups internal to NASA Centers
- 3.4. <u>COTR:</u> Contracting Officer Technical Representative
- 3.5. <u>NSRS Administration Office</u>: The office of the NSRS Support Contractor who administers the anonymous reporting system and works in close coordination with NSRS Chair and the CoTR.
- 3.6. NSRS Chair: The Chair of the NSRS Technical Advisory Group at NASA Headquarters
- 3.7. <u>NSRS Technical Advisory Group (TAG)</u>: The Center NSRS representatives assisting NASA HQ in administering the system.

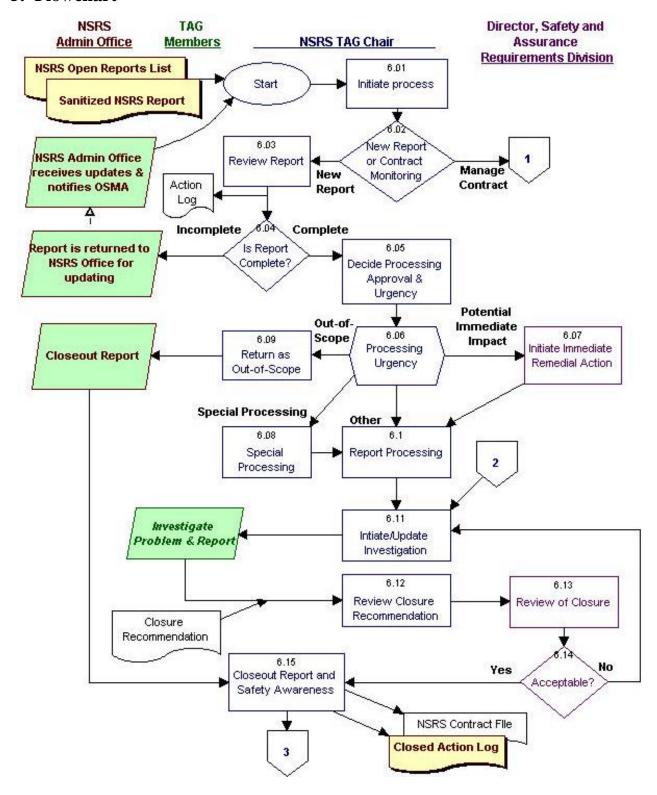
- 3.8. Reporter: Person making the NSRS report.
- 3.9. <u>Report Closure</u>: The approval of the NSRS report response by the Chair and Director, Safety and Assurance Requirements Division.

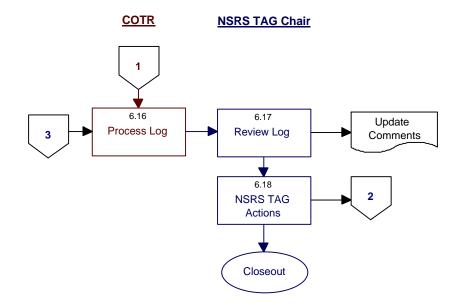
4. Reference Documents

The documents listed in this section are used as reference materials for performing the processes covered by the Quality Management System (QMS). Since all NASA Headquarters Level 1 (QMS Manual) and Level 2 (Headquarters Common Processes) documents are applicable to the QMS, they need not be listed in this section unless specifically referenced in this OSMA HOWI.

- 4.1. <u>41 CFR Subpart 101-37.11: Accident and Incident Reporting and Investigation" (Federal Property Management Regulations)</u> [This reference only used if the National Transportation Safety Board is involved]
- 4.2. NPD 8700.1: NASA Policy for Safety and Mission Success
- 4.3. NPD 8710.2: NASA Safety and Health Program Policy
- 4.4. NPR 8621.1: NASA Procedural Requirements for Mishap Reporting, Investigating, and Recordkeeping.
- 4.5. NPR 8715.3: NASA Safety Manual
- 4.6. NSRS Operating Guide (Revised: February 14, 2001)
- 4.7. NSRS Technical Manual (Revised: February 14, 2001)

5. Flowchart





6. Procedure

NOTE: ALL NSRS REPORT PROCESSING MUST ENSURE ANONYMITY OF THE REPORTER.

The NSRS Administration Office receives a new NSRS report, removes identifying information concerning the reporter from the reports, then forwards the sanitized report to the NASA NSRS Chair, Safety and Risk Management Division. The NSRS Chair is pre-notified of the report by telephone. If the NSRS Chair is not available, the Director, Safety and Risk Management Division will be telephoned or paged. This notification is not written to ensure the report is not intercepted.

The NSRS Administration Office transmits the sanitized report by fax to the NASA Safety and Assurance Requirements Division. The sanitized reports includes the report accession number, report type, dates received, sanitized narrative and callback results. When sanitized NSRS reports are to be sent to NASA Safety and Assurance Requirements or the TAG by fax, the recipient shall be notified that the transmission is coming and should be prepared to retrieve it to prevent interception.

The references listed in Section 4 define the parameters which control the process.

6.01 NSRS Chair Initiate process:

Upon notification of a new NSRS report or receipt of the NSRS Open Report Log, the NSRS Chair initiates the process.

6.02 NSRS Chair New Report or Contract Monitoring

If there is a new NSRS report, the process continues with step 6.03, if there is a new copy of the NSRS Open Report Log, the process continues with step 6.16.

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6.03 NSRS Chair

Review New Report:

The NSRS Chair reviews the new NSRS report for completeness. A complete NSRS report has adequate data fields on the form filled in to evaluate the reported concern. This evaluation is based on the professional background of the NSRS Chair. The NSRS Chair initiates and attaches a NSRS Action Log (Appendix B) to the report file.

If there is a need for additional information to proceed with the investigation and/or resolution of the problem, the Chair directs the NSRS Project Manager to obtain more information from the NSRS reporter. In these cases, a callback to the reporter (if reporter can be identified) is completed as soon as possible after the NSRS Administration Office receives the report. Callbacks are required if the report does not explain what, why, how, when, and under what circumstances the hazard exists, or does not describe expected impacts if the hazard is not corrected. Additional callbacks may be made at the request of the NSRS Chair.

6.04 NSRS Chair

Is Report Complete?

If the NSRS Chair identified a need for additional information in the review, then the report is returned to the NSRS Administration Office for data gathering. Otherwise, the process continues. The Action Log is updated if it is returned to the NSRS Administration Office.

6.05 NSRS Chair

Report Processing Level:

The NSRS Chair reviews each report for the following items to define the next step in processing the report: (The Action Log is updated if the report is marked as urgent, out-of-scope, or requires special processing.)

- The NSRS Chair reviews the report for urgency. If the NSRS report is urgent and involves an upcoming NASA mission (i.e.; Shuttle Launch) the Director, Safety and Assurance Requirements Division is notified about the NSRS report. Immediate remedial action may be required.
- 2. NSRS reports that are deemed to be out-of-scope are closed out. Out-of-scope reports are ones which do not deal with a safety problem covered by NSRS. These may be provided to the other organizations for their action.
- 3. The NSRS Chair determines if any special processing is required for further processing of the NSRS report. Several types of reports require special handling which include (but are not limited to) reports that contain national security classified information, reports containing very personal information which can not be sanitized without losing the nature of the report, reports of alleged criminal activity, and aspects that describe out-of-scope complaints or may involve very high profile personnel. Section 2 of the NSRS Operating Guide contains detailed procedures on Special NSRS Report Handling. Reports involving alleged criminal activity require that the NASA Inspector General Office be notified immediately.

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For Shuttle Launch/Mission Support problems the following special procedures apply:

- Commencing with the Flight Readiness Review (FRR), about 2 weeks prior to each Space Shuttle launch date and through recovery, the NSRS Administration Office will heighten its report handling posture. (Commencing at L-2 days in the countdown, the NSRS Administration Office will report received life-threatening safety concerns directly to the NSRS Chair, and Director, Safety and Assurance Requirements.)

6.06 NSRS Chair

Processing Urgency

Based on the previous step the report is processed either as out-of-scope, urgent requiring immediate remedial action, special processing, or normal processing.

6.07 Director, Safety and Assurance Requirements Initiate Immediate Remedial Action:

The Director notifies the NASA SMA Offices and NASA management officials that are/should be involved with the NSRS report. Notification will be limited to the nature of the report and that immediate remedial action is needed. The persons who are notified are based on the nature of the NSRS report and the breadth of the problem and its potential effect. The Director assures anonymity of the reporter. The goal of the notification is to prevent further hazard propagation, not to investigate the reported problem.

For Space Shuttle reports deemed urgent during launch operations, the Safety Representative located at KSC will ensure the proper action is taken with regards to the remedial action specified by the NSRS Chair or higher authority. The NSRS Administration Office will support the NSRS as urgent while Shuttle missions are in progress, during recoveries, and until the Orbiter is returned to KSC or other repair facility (i.e.; Palmdale Facility).

6.08 NSRS Chair

Special Processing:

The NSRS Chair will define the special processing needed for the report and add a cover to the report. The NSRS Chair will ensure that the special processing is maintained throughout the Report processing. This category of processing may be used for very sensitive reports or reports containing national security information.

6.09 NSRS Chair

Identify as Out-of-Scope

The NSRS Chair returns the report to the NSRS Administration Office with direction that the report is to be identified as out-of-scope and closed out.

6.10 NSRS Chair

Report Processing

The NSRS Administration Office retains the original report form and then returns the identification strip to the reporter.

The NSRS Chair adds the report accession number and investigative status to the NSRS status web page at http://www.hq.nasa.gov/office/codeq/status/. The NSRS Chair notifies the Director of Safety and Assurance Requirements and other internal branches having interest in the reported incident.

6.11 NSRS Chair

Initiate Investigation:

The NSRS Chair has the responsibility to ensure that the safety issues reported to the NSRS are resolved. The NSRS Chair reviews the report and makes a decision on how the report will be investigated. The goal of the investigation is to determine how to prevent further safety hazard propagation and not investigate to lay blame or to uncover the identity of the reporter.

The NSRS Chair establishes a Working Group from within the TAG members. The Working Group, in most cases, will be a single Center TAG member or a subset of all TAG members. A lead is identified to coordinate the investigation.

The Working Group will identify if a valid safety issue is discovered. Their job is to develop and implement a corrective action plan.

Generally, a written status report is due to the NSRS Chair every 30 days until the issue is satisfactorily resolved. At that point, the NSRS TAG member provides a recommendation for closure along with a closure rationale in writing to the NSRS Chair. The Action Log and NSRS status web page are updated showing assignments made and direction given.

- ** Note: This step may also be reached as an output of either steps 6.14 or 6.18. In these steps additional guidance or direction was determined to be needed for the processing of the NSRS report. This may be due to timeliness, other similar reports, unacceptable closeout rationale, or any other reason deemed necessary in the professional opinion of the NSRS Chair. The NSRS Chair provides the additional guidance to the TAG Working Group.
- ** Note: The NSRS Office is not authorized to discuss NSRS reports with anyone outside the NASA Safety and Assurance Requirements Division, including TAG members. TAG members must direct any questions about NSRS reports to the NSRS Chair.

6.12 NSRS Chair

Review Closure Recommendations:

Justification of the TAG member's closeout recommendation is based on the input and concurrence of NASA Center senior management and safety officials. A closure recommendation from a TAG requires three concurrences/signatures before it will be considered for closure by the NSRS Chair:

- 1) The concurrence/signature of the TAG member leading the investigation,
- 2) The concurrence signature of the Center SMA Director at the facility where the hazard has been identified and investigated, and
- 3) The concurrence/signature of the line-manager who resides at a management level one step above the level where management decisions would normally be made for the process in question.

The NSRS Chair reviews the response and coordinates it with NASA Headquarters personnel that have responsibility in the reported area as well as OSMA management. The time required to officially complete the close out of a report may vary depending on the nature of the report. Generally, reports are not "closed" by the NSRS Chair until all evidence of corrective action to resolve the problem has been provided.

When the report is ready to be closed, the NSRS Chair then certifies the satisfactory resolution of the safety issue, in writing on the Action Log. The NSRS Chair can then recommend closing the file to the Director, Safety and Assurance Requirements Division.

6.13 Director, Safety & Assurance Requirements Division Review of Closure:

The Director, Safety and Assurance Requirements Division will indicate concurrence with the NSRS Chair's recommendation by signing the Action Log. If resolution questions remain the issue may be raised to higher organizational levels for resolution, including the NASA Administrator, or referred to another NASA HQ organization or Center for evaluation.

If either the NSRS Chair or the Director, Safety and Assurance Requirements Division does not agree with the closure rationale, discussions may be held with appropriate organizational levels to resolve the matter. If agreement still cannot be reached, similar joint discussions shall be held at the Associate Administrator level, or even with the NASA Administrator, to reach a final decision

6.14 Director, Safety & Assurance Requirements Division Acceptable?

If the Closure is acceptable, then the NSRS report is closed out. Otherwise, the NSRS Chair is directed to continue the investigation.

6.15 NSRS Chair Closeout & Safety Awareness:

After approval the NSRS Chair completes the NSRS Report Action Log which has been included as a cover sheet for the report (see Appendix B for a sample). The NSRS Chair assigns a final status code and updates the NSRS status page. The original Closeout Sheet is forwarded to the NSRS Administration Office along with the file on the report generated in step 6.05. The NSRS Chair and the NSRS Administration Officer sign the "Transfer of NSRS Report" form. (See Appendix A.).

The NSRS Open Report Log is updated by the NSRS Administration Office.

The NSRS Administration Office will enter a summary of final resolution actions into the database along with the date of closure for all NSRS issues, completing action on the report. and quality records have been filed, then the process is closed out.

Note: Safety awareness may be conducted after the report has been closed (see Appendix A.)

6.16 COTR for NSRS Administration Contract Process Log

The COTR for the NSRS Administration Office Contract reviews the submitted log for contract compliance. Comments are appended to the log and forwarded to the NSRS Chair.

6.17 NSRS Chair Review Log

The NSRS Chair reviews the COTR's comments and verifies the accuracy of the log against the open and closed action report sheets. If changes are needed to the log, they are forwarded to the NSRS Administration Office for updating of the Open Report Log.

6.18 NSRS Chair NSRS TAG Actions

The NSRS Chair reviews the report log sheets for actions which are overdue, nearing their due date, or were identified as high profile reports. The lead for the investigation (see step 6.11) is contacted for status. After all open reports have been reviewed, the process is closed out.

7. Quality Records

Record ID	Owner	Location	Media Electronic /hardcopy	Schedule Number & Item Number	Retention & Disposition
NSRS Open Reports List	NSRS COTR	COTR Contract File	Hardcopy	Schedule: 5 Item: 25.A	Contract length plus 1 year then forward to CO with CO permission
Sanitized NSRS Report	NSRS Chair	NSRS Admin Office	Hardcopy	Schedule: 1 Item: 120.E	Keep as long as report has reference value or destroy when 15 years old **See Note**
Closed Action Log	NSRS Chair	NSRS Admin Office	Hardcopy	Schedule: 1 Item: 120.E	Keep as long as report has reference value then destroy when 15 years old. **See Note**

<u>Note</u>: Destruction of NSRS Reports may <u>only</u> be done with the permission of the NSRS Chair or the COTR. Immediately prior to the end of the contract or upon direction of the COTR or Contracting Officer, all NSRS Records and NSRS Files being held by the NSRS Administration Office will be transitioned to the new contractor or returned to OSMA.

Appendix A: Safety Awareness:

In addition to their technical involvement with NSRS safety issues, TAG members represent the interests and manage the participation in the NSRS of their particular NASA Center or Headquarters office. Periodically the TAG Chair may convene the entire TAG to discuss all facets of the NSRS. The Chair, who reports to the Director, Safety and Assurance Requirements Division, manages TAG activities. TAG members are expected to manage the Awareness Program at their respective locations and ensure that reporting forms and information about the NSRS are readily available to every employee. Each member serves as an advisor to the NSRS Chair on the implications of NSRS operating procedures, maintenance of reporter confidentiality, NSRS report resolution, and closeout procedures. The TAG may participate in NSRS program reviews, provide recommendations on the Awareness Program, and suggest topics, formats, and schedules for the analysis of NSRS data.

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Appendix B: NSRS Action Log

A copy of the Action Log and the transfer form is contained as Appendix B.

NSRS Office, NASA Safety and Assurance Requirements Division (Code QS) NSRS ACTION LOG

NSRS Report	Accession Number:					
Date Received	d at HQ:					
Topic:						•
Preliminary So	creening by HQ:	Actio	n Assign	ments:	Initial Review and Status by	New: Yes
Out of Sco Screened by:	Material / Criminal Activities ope	ARC DFRC GRC GSFC JPL JSC KSC LaRC MSFC SSC	ime	Coord.	Tag Member(s): Category: Admin/M Design Industria Maintena Non-Safe Operatio Procedur	ance ety ns
Date	Actio	n		Con	nments	Due Date
Use CONTINU	JATION SHEET to com	plete Action Log, i	f required	d		
Recommende	d Disposition by TAG M	lember(s):				
Concurrence:	TAG Chairr	man			Sign	nificant: Yes No
Approved:		D	ate:			

Director, Safety and Assurance Requirements Division

NSRS Office, NASA Safety and Assurance Requirements Division (Code QS) NSRS ACTION LOG CONTINUATION SHEET



_			V
Date	Action	Comments	Due Date

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National Aeronautics and Space A Washington, D.C. 20546	dministration	
Office of Safety and Assurance Re Code QS	quirements	Mission Claces Starts William
DATE:		
SUBJECT: Transfer of NSRS Rep	oort(s) #	
The above referenced NSRS report	ts have been approved for c	closure by Code QS.
A signed NSRS Action Log and al have been officially transferred to		or the above referenced NSRS reports osure.
Chairman	-	
NSRS Technical Advisory Group		
NSRS Program Manager	-	
Enclosure(s)		